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March 22, 2019

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia SC 29210

Re: Application of Duke Energy Carolinas, LLC for Adjustments in Electric Rate Schedules
and Tariffs and Request for an Accounting Order
Docket Number 2018-319-E

Dear Mrs. Boyd:

Counsel for Duke Energy Carolinas has requested from counsel for the South Carolina NAACP, Coastal Conservation League, and Upstate Forever ("SC NAACP et al") two clarifications related to the surrebuttal testimony of John Howat. It is our understanding that these two clarifications will obviate the need for cross-examination and that DEC would then not object to receiving Mr. Howat's pre-filed direct testimony and surrebuttal testimony, with exhibits, into the record and would not object to a request to waive his appearance at the hearing.

The first clarification relates to Data Request No. 2-1 from SC NAACP et al that sought information relating to a chart on page 7 of Mr. Pirro's rebuttal testimony relating to usage levels of residential customers who makes less than \$30,000 per year. The original response from DEC included a spreadsheet that listed customers (without identifying information) who make less than \$30,000 per year, but with no corresponding electricity usage levels. At about 3:45 in the afternoon of Tuesday, March 19, DEC submitted a supplemental response to Data Request No. 2-1, which included an updated spreadsheet that included the missing usage levels. Undersigned counsel did not receive the supplemental response in time for it to inform the surrebuttal testimony of Mr. Howat, which was filed at approximately 4:00 pm on that same day. Had we received the supplemental response sooner, Mr. Howat would not have included the statement on page 2, lines 15-16 of his surrebuttal, that DEC did not "provide workpapers with customer electricity usage information" and on lines 20-21 to the effect that the chart on page 7 of Mr. Pirro's rebuttal testimony is not replicable.

In addition, in response to a question from counsel for DEC, Mr. Howat would agree that there are some low-income residential customers in DEC's South Carolina service territory whose usage levels are above average.

Sincerely,



David L. Neal
Attorney for SC NAACP et al